

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
BROWN RUDNICK LLP Kenneth J. Aulet, Esq. (admitted <i>pro hac vice</i>) Seven Times Square New York, New York 10036 (212) 209-4800 kaulet@brownrudnick.com	GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 (973) 230-2095 DStolz@genovaburns.com DClarke@genovaburns.com
BROWN RUDNICK LLP Tristan Axelrod, Esq. (admitted <i>pro hac vice</i>) One Financial Center Boston, MA 02111 (617)856-8300 taxelrod@brownrudnick.com	<i>Local Counsel for the Plan Administrator</i>
<i>General Counsel for the Plan Administrator</i>	
In re: BLOCKFI INC., <i>et al.</i> , Debtors. ¹	Chapter 11 Case No. 22-19361 (MBK) (Jointly Administered under a Confirmed Plan ²) Hearing Date: October 9, 2024 at 10:00 a.m. ET Objection Deadline: October 2, 2024

**NOTICE OF WIND-DOWN DEBTORS' MOTION FOR FINAL DECREE
CLOSING CERTAIN CHAPTER 11 CASES AND GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that BlockFi Inc. and its debtor affiliates (collectively, “BlockFi” or the “Wind-Down Debtors”), as managed by the Plan Administrator in the above-referenced Chapter 11 cases (the “Chapter 11 Cases”), by and through undersigned counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

² On October 3, 2023, the Court entered an order (the “Confirmation Order”) [Docket No. 1660] confirming the *Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications)* (the “Plan”) [Docket No. 1609]. Capitalized terms not otherwise defined herein shall have the meanings contained in the Plan.

United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 for entry of an order substantially in the form submitted herewith (the “Proposed Order”), (a) issuing a final decree providing for the closing of certain of the above-captioned jointly-administered Chapter 11 Cases listed on Schedule 1 annexed to the Proposed Order (the “Fully Administered Cases”); (b) authorizing the Wind-Down Debtors to amend the schedule of Fully Administered Cases by submitting a proposed form of order to the Court, and without further notice or hearing, and (c) granting such related relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion for Final Decree Closing Certain Chapter 11 Cases and Granted Related Relief will be held on **October 9, 2024 at 10:10 a.m. (ET)** or as soon thereafter as counsel may be heard before Judge Kaplan at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8.

PLEASE TAKE FURTHER NOTICE that the Wind-Down Debtors will be relying on the Motion for Final Decree Closing Certain Chapter 11 Cases and Granted Related Relief and that no brief is being filed since the legal basis upon which relief should be granted is set forth in the motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-2(a)(2), any objections must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova Burns, LLC, Attn: Daniel M. Stolz, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey **so they are received no later than October 2, 2024.**

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested in the Motion for Final Decree Closing Certain Chapter 11 Cases and Granted Related Relief may be granted without further notice.

Dated: September 18, 2024

/s/ Daniel M. Stolz

GENOVA BURNS LLC

Daniel M. Stolz, Esq.

Donald W. Clarke, Esq.

110 Allen Rd., Suite 304

Basking Ridge, NJ 07920

(973) 230-2095

Dstolz@genovaburns.com

Dclarke@genovaburns.com

Local Counsel to the Plan Administrator

BROWN RUDNICK LLP

Kenneth J. Aulet, Esq. (admitted *pro hac vice*)

Seven Times Square

New York, New York 10036

(212) 209-4800

kaulet@brownrudnick.com

BROWN RUDNICK LLP

Tristan Axelrod, Esq. (admitted *pro hac vice*)

One Financial Center

Boston, MA 02111

(617)856-8300

taxelrod@brownrudnick.com

General Counsel to the Plan Administrator